

FILED

JUL 13 2020

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

QINGYUN SUN,

Defendant.

Criminal No.

1:20 cr 28 IMK

Violations:

18 U.S.C. § 1343

26 U.S.C. § 7206(1)

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Wire Fraud)

1. At all relevant times, the defendant, **QINGYUN SUN**, was a Chinese national employed by West Virginia University ("WVU"), a research university located in Morgantown, West Virginia, as an associate professor and the associate director of the United States-China Energy Center at WVU.

2. At all relevant times, WVU contracted part of the defendant's time to the West Virginia Development Office, an office within the West Virginia Department of Commerce, where he acted as the Governor's assistant for China affairs.

3. At all relevant times, the defendant was also employed by Synfuels Americas Corporation d/b/a Synfuels Americas ("Synfuels Americas"), an energy conversion technology provider of coal-to-liquids and gas-to-liquids processes, located in Sterling, Virginia.

4. At all relevant times, Synfuels Americas was a subsidiary of Synfuels China, which has its headquarters in Beijing, China.

5. On or about September 28, 2015, in the Northern District of West Virginia, the defendant, **QINGYUN SUN**, devised and intended to devise a scheme and artifice to defraud and obtain money and property from WVU by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud and deprive, did knowingly transmit and cause to be transmitted in interstate commerce, by means of wire communications, certain signs and signals.

THE SCHEME AND ARTIFICE TO DEFRAUD

6. The object of the scheme and artifice to defraud was for the defendant to defraud and obtain money and property from WVU by the defendant making materially false and fraudulent representations to WVU.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

It was part of the scheme and artifice to defraud that:

7. The defendant would use his personal credit card to purchase a coach class United Airlines flight from the United States to China.

8. The defendant would use his personal credit card to purchase a business class United Airlines flight from the United States to China for the same travel as the coach class flight.

9. The defendant would use only the business class flight and redeem the coach class flight.

10. The defendant would submit the United Airlines email confirmation for the coach class flight to WVU in support of his request for reimbursement.

11. The defendant would submit the business class flight to Synfuels Americas in support of his request for reimbursement.

12. The defendant would receive reimbursement from WVU for the coach class airfare and from Synfuels Americas for the business class airfare.

USE OF INTERSTATE WIRE COMMUNICATIONS

13. On or about September 28, 2015, in the Northern District of West Virginia and elsewhere, the defendant, **QINGYUN SUN**, for the purpose of executing and attempting to execute the above described scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate commerce, the following writing and signal, to wit: the defendant caused United Airlines to send him an email confirmation, which traveled via wire transmission from a United Airlines computer server located outside the State of West Virginia to a WVU computer server located in the Northern District of West Virginia, in violation of Title 18, United States Code, Section 1343.

COUNT TWO

(Filing False Income Tax Return)

On or about April 11, 2014, in Monongalia County, in the Northern District of West Virginia, the defendant, **QINGYUN SUN**, did willfully make and subscribe an Income Tax Return for tax year 2013, which contained and was verified by an electronic declaration that it was made under penalties of perjury and which he did not believe to be true and correct as to every material matter; that is to say, he filed an Income Tax Return for himself and his spouse for that year willfully overstating his Schedule C expenses, resulting in an unpaid tax due and owing, in violation of Title 26, United States Code, Section 7206(1).



WILLIAM J. POWELL
United States Attorney

Jarod J. Douglas
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